

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
EASTERN DIVISION

## PRELIMINARY ORDER OF FORFEITURE

WHEREAS, on December 20, 2018, defendant pled guilty to Count 1 of the Information, for which the Government sought forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853(p), in the form of a money judgment in the amount of \$128,190,128, representing any property real or personal, which constitutes, or derived from proceeds traceable to violations of Title 18, United States Code, Section 1343 (wire fraud).

AND WHEREAS, pursuant to Rules 32.2(b)(2) and 32.2(c)(1), since this forfeiture consists solely of a money judgment against Randy Constant, no ancillary proceeding is required;

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that pursuant to Federal Rule of Criminal Procedure 32.2; Title 18, United States Code, Section 981(a)(1)(C); and Title 28, United States Code, Section 2461(c), the sum of **One Hundred Twenty-eight Million One Hundred Ninety Thousand One Hundred Twenty-eight Dollars (\$128,190,128)** in United States currency is

hereby condemned and forfeited to the United States of America and all rights, title, and interest in such property are hereby forever removed, discharged, condemned, and forfeited to the United States of America and shall be disposed of according to law; and

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that pursuant to Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure, upon entry of this Preliminary Order of Forfeiture, the Court hereby authorizes the Attorney General or his designated representative to conduct discovery, to identify or locate the property subject to forfeiture, and to seize the property ordered forfeited upon such terms and conditions as set forth by the Court; including any substitute assets, and

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED, the money judgment against defendant shall become final at sentencing pursuant to Rule 32.2(b)(4)(A);

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED, that the United States Department of Justice, United States Marshals Service, shall dispose of any forfeited property in accordance with the law; and

IT IS FURTHER ORDERED, ADJUDGED and DECREED that this judgment against Randy Constant, shall be recorded in the records of the County Recorder's Office in the county of the defendant's residence and any and all other counties in which the defendant has either real or personal property as a lien

thereon in the amount of **One Hundred Twenty-eight Million One Hundred Ninety Thousand One Hundred Twenty-eight Dollars (\$128,190,128)**; and

IT IS FURTHER ORDERED, ADJUDGED and DECREED upon the payment of the judgment in full, that the United States shall file a Satisfaction of Judgment with the District Court and the appropriate Recorder of the County in which any abstract of judgment has been filed; and

IT IS FURTHER ORDERED, ADJUDGED and DECREED that this Order is in continuing and full effect until payment of the **One Hundred Twenty-eight Million One Hundred Ninety Thousand One Hundred Twenty-eight Dollars (\$128,190,128)** is made in full.

IT IS SO ORDERED this 24th day of June, 2019.



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C.J. Williams  
United States District Judge  
Northern District of Iowa